1	Robert W. Freeman Nevada Bar No. 3062	
2	Jason G. Revzin Nevada Bar No. 8629	
3	LEWIS BRISBOIS BISGAARD & SMITH LLP 6385 South Rainbow Blvd., Suite 600	
4	Las Vegas, NV 89118	
5	Telephone: (702) 893-3383 Fax: (702) 893-3789	
	Email: <u>robert.freeman@lewisbrisbois.com</u> Email: <u>jason.revzin@lewisbrisbois.com</u>	
6	Attorneys for Defendant State Farm Bank	
7		
8	UNITED STATES DISTRICT COURT	
9	DISTRICT OF NEVADA	
10		
11	WILLIAM E. FLORENCE III, on behalf of himself	Case No.: 2:16-cv-00515-APG-GWF
12	and all others similarly situated,	CLASS ACTION
13	Plaintiff,	STIPULATION AND ORDER FOR
14	V.	EXTENSION OF TIME TO ANSWER OR RESPOND TO COMPLAINT
15	STATE FARM BANK,	(FIRST REQUEST)
16	Defendant.	(TIKOT KEQUEST)
17	Defendant State Farm Bank and Plaintiff W	illiam F. Florence III. by and through counsel
18	Defendant State Farm Bank and Plaintiff William E. Florence III, by and through counsel,	
	and pursuant to Fed. R. Civ. P. 6(b), hereby stipulate and agree to an extension of time to answer or	
19	otherwise respond to the Complaint.	
20	Plaintiff filed his Complaint on March 8, 201	6. Defendant State Farm Bank was served with
21	a copy of the summons and complaint on March 21,	2016. Pursuant to Fed. R. Civ. P. 12(a)(i), the
22	deadline for State Farm Bank to respond to the Com	aplaint is currently April 11, 2016. Plaintiff has
23	agreed to permit Defendant State Farm Bank a short extension of an additional 30 days to respond to	
24	the Complaint, until and including May 11, 2016.	This brief extension will allow Defendants to
25	continue to investigate Plaintiff's allegations and to confer with Plaintiff's counsel regarding the	
26	same. This is the parties' first request for an extens	ion of time to respond to the Complaint, and is

Therefore, Defendant and Plaintiff respectfully request that the Court grant an extension of

4827-5168-3888.1

not intended to cause any delay or prejudice to any party.

27

28

1	time for Defendant State Farm Bank to answer or otherwise respond to the Complaint until and	
2	including May 11, 2016 .	
3		
4	DATED: April 6, 2016	
	Lewis Brisbois Bisgaard & Smith LLP	
5		
6		
7	/s/ Jason G. Revzin Robert W. Freeman	
8	Nevada Bar No. 3062 Jason G. Revzin	
	Nevada Bar No. 8629	
9	6385 South Rainbow Blvd., Suite 600	
0	Las Vegas, NV 89118 Telephone: (702) 893-3383	
	Fax: (702) 893-3789	
11	Email: robert.freeman@lewisbrisbois.com	
12	Email: jason.revzin@lewisbrisbois.com Attorneys for Defendant State Farm Bank	
	Allorneys for Defendant State Parm Bank	
13		
14	/s/ Michael Kind	
15	Michael Kind, Esq.	
	Kazerouni Law Group, APC	
6	7854 W. Sahara Ave	
17	Las Vegas, NV 89117 Phone: (800) 400-6808 x 7	
	Fax: (800) 520-5523	
8	mkind@kazlg.com	
اما		
19	David H. Krieger, Esq.	
20	Haines & Krieger, LLC	
21	8985 S. Eastern Avenue, Suite 130	
21	Henderson, NV 89123	
22	Phone: (702) 880-5554 Fax: (702) 385-5518	
23	dkrieger@hainesandkrieger.com	
	Attorneys for Plaintiff	
24	IT IS SO ORDERED:	
25	II IS SO GREENED.	
26	Leorge Folia O	
27	GEORGE FOLEY, JR.	
	United States Magistrate Judge	
28	DATED: April 7, 2016	

1	CERTIFICATE OF SERVICE	
2	This is to certify that on the 6 th of April, 2016, I filed STIPULATION AND ORDER FOR	
3	EXTENSION OF TIME TO ANSWER OR RESPOND TO COMPLAINT (FIRST	
4	REQUEST) with the Clerk of the Court using the CM/ECF system which will send notification of	
5	such filing to the following counsel:	
6	Michael Kind, Esq.	
7	Kazerouni Law Group, APC 7854 W. Sahara Ave	
8	Las Vegas, NV 89117	
9	Phone: (800) 400-6808 x 7 Fax: (800) 520-5523	
10	O mkind@kazlg.com	
11	David H. Krieger, Esq. Haines & Krieger, LLC	
12	8985 S. Eastern Avenue, Suite 130	
13	Henderson, NV 89123 Phone: (702) 880-5554	
14	Fax: (702) 385-5518 dkrieger@hainesandkrieger.com	
15		
16		
17	/s/ Carrie S. Dunham	
18	An Employee of LEWIS BRISBOIS BISGAARD & SMITH LLP	
19		
20		
21		
22		
23		
24		
25		
26		
27		
20		